

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DISTRICT**

LEAH NICOLE CLARK, et al.)
)
)
Plaintiffs,) Civil Action
)
) File No. 5:13-cv-2291-IPJ
)
v.)
)
MICHELIN NORTH AMERICA, INC.,)
)
)
Defendant.)

MOTION FOR ADMISSION PRO HAC VICE

Michael D. McKibben, counsel for Defendant, Michelin North America, Inc. (“MNA”), a member in good standing of the Bar of Alabama and this Court, moves this Court to allow Robert P. Monyak, of Peters & Monyak, LLP, to appear *pro hac vice* in this matter as co-counsel for MNA. As grounds for this Motion, counsel states as follows:

1. Robert P. Monyak is counsel at Peters & Monyak, LLP, located at 950 E. Paces Ferry Rd., N.E., Suite 2275, Atlanta, Georgia 30326. His telephone number is (404) 607-0100.
2. Robert P. Monyak is a duly licensed attorney in good standing in the Northern District of Georgia. *See* Certificate of Good Standing for Mr. Monyak, attached as Exhibit A. Mr. Monyak is currently licensed by, in good standing with, or admitted to practice before the United States District Courts of Georgia. There are no disciplinary actions or investigations of Mr. Monyak’s conduct pending in said court and Mr. Monyak has never been the subject of a grievance or disciplinary procedure.

3. Robert P. Monyak agrees to subject himself to the jurisdiction of this Court in any matter arising out of his conduct in this cause, and he agrees to be bound by the rules of professional responsibility applicable to lawyers practicing in this Court.

4. Michael D. McKibben of the law firm of Bradley Arant Boult Cummings LLP, is counsel for MNA in this action and is sponsoring Robert P. Monyak's admission to practice before this Court *pro hac vice*.

WHEREFORE, Michael D. McKibben respectfully requests this Court to admit Robert P. Monyak *pro hac vice* for Defendant, Michelin North America, Inc., in this action.

Dated this 22nd day of January, 2014.

/s/ Michael D. McKibben
Michael McKibben, Esq. (MCK028)
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Attorneys for Michelin North America, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2014 a copy of the foregoing was filed using the Court's CM/ECF system, which will send electronic notification to the following:

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/s/ Michael D. McKibben
Of Counsel



CERTIFICATE OF GOOD STANDING

UNITED STATES OF AMERICA }
NORTHERN DISTRICT OF GEORGIA } ss.
}

I, James N. Hatten, Clerk of the United States District Court for the Northern District of Georgia,

DO HEREBY CERTIFY that ROBERT PAUL MONYAK, State Bar No. 517675, was duly admitted to practice in said Court on November 4, 1985, and is in good standing as a member of the bar of said Court.

Dated at Atlanta, Georgia, this 22nd day of January, 2014.

JAMES N. HATTEN
CLERK OF COURT

By:


Joyce White
Deputy Clerk



EXHIBIT A